

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation; AMAZON.COM SERVICES LLC, a Delaware limited liability company; CANON KABUSHIKI KAISHA, a Japanese corporation; and CANON U.S.A., INC., a New York corporation,

Plaintiffs,

v.

CIHAN AKGOZ, an individual; UMUT ALTAN, an individual; YILDIZ BAYRAM, an individual; SATUK BUGRAHAN OZTURK, an individual; FERDI CELIK, an individual; IBRAHIM CELIK, an individual; ALONA HURNIAK, an individual; ZEKERIYA KESKIN, and individual; PAVLO POPERECHNIUK, an individual; VARVARA SUKACHOVA, an individual; BATUHAN TERZI, an individual; MEDENI ULUDAG, an individual; YIGIT CAN CELENOGU, an individual; and DOES 1-10,

Defendants.

No.

**COMPLAINT FOR DAMAGES AND
EQUITABLE RELIEF**

I. INTRODUCTION

1. This case involves Defendants' unlawful and expressly prohibited sale of counterfeit printer toner cartridges bearing the trademarks of Canon Kabushiki Kaisha, which develops printer toner cartridges and imports, markets, and sells printer toner cartridges in the



1 United States through its wholly-owned subsidiary Canon U.S.A., Inc. (together with Canon
2 Kabushiki Kaisha, “Canon”). Amazon.com, Inc., and Amazon.com Services LLC (collectively,
3 “Amazon”) and Canon (together with Amazon, “Plaintiffs”) jointly bring this lawsuit to
4 permanently prevent and enjoin Defendants from causing future harm to Amazon’s and Canon’s
5 customers, reputations, and intellectual property (“IP”), and to hold Defendants accountable for
6 their illegal actions.

7 2. Amazon.com Services LLC owns and operates the Amazon.com store (the
8 “Amazon Store”), and Amazon’s affiliates own and operate equivalent counterpart international
9 stores and websites. Amazon’s stores offer products and services to customers in more than 100
10 countries around the globe. Some of the products are sold directly by Amazon entities, while
11 others are sold by Amazon’s numerous third-party selling partners. The Amazon brand is one of
12 the most well-recognized, valuable, and trusted brands in the world. To protect its customers and
13 safeguard its reputation for trustworthiness, Amazon invests heavily in both time and resources
14 to prevent counterfeit and infringing goods from being sold in its stores. In 2023 alone, Amazon
15 invested over \$1.2 billion and employed more than 15,000 people to protect its stores from
16 counterfeits, fraud, and other forms of abuses.

17 3. Canon is one of the most successful suppliers of printing, photographic, and
18 imaging equipment and related goods, with a long history of marketing and selling high quality
19 products since its founding in 1937. Canon develops cutting edge printing technology. Canon
20 Kabushiki Kaisha, through its wholly-owned United States subsidiary, Canon U.S.A., Inc.,
21 imports, markets, distributes, and sells Canon-branded printers and printer accessories under its
22 famous trademarks.

23 4. Canon, along with its contractors, develops, designs, and manufactures toner
24 cartridges designed to work with each of its printer models.

25 5. Canon owns, manages, enforces, licenses, and maintains IP, including various
26 trademarks. Canon Kabushiki Kaisha owns the following registered trademarks (the “Canon
27 Trademarks”):

<u>Mark</u>	<u>Registration No. (International Classes)</u>
CANON	1,315,232 (IC 009)
	4,903,423 (IC 002)
	2,674,673 (IC 002)
CANON	975,904 (IC 009)

True and correct copies of the registration certificates for the Canon Trademarks are attached as **Exhibit A.**

6. Beginning in 2011, Defendants registered with Amazon to sell in the Amazon Store. After extensive investigation, Plaintiffs have discovered that Defendants used falsified identity documents and fraudulent information in a deliberate attempt to conceal their identities and locations and to circumvent Amazon's robust verification processes. At various times from November 13, 2021, through March 29, 2024, Defendants advertised, marketed, offered, distributed, and sold counterfeit Canon products in the Amazon Store, using the Canon Trademarks, without authorization, in order to deceive customers about the authenticity and origin of the products and the products' affiliation with Canon.

7. As a result of their illegal actions, Defendants have infringed and misused Canon's IP; breached their contracts with Amazon; willfully deceived and harmed Amazon, Canon, and their customers; compromised the integrity of the Amazon Store; and undermined the trust that customers place in Amazon and Canon. Defendants' illegal actions have caused Amazon and Canon to expend significant resources to investigate and combat Defendants' wrongdoing and to bring this lawsuit to prevent Defendants from inflicting future harm to Amazon, Canon, and their customers.


II. PARTIES

8. Amazon.com, Inc. is a Delaware corporation with its principal place of business in Seattle, Washington. Amazon.com Services LLC is a Delaware limited liability company with its principal place of business in Seattle, Washington.

9. Canon Kabushiki Kaisha is a Japanese corporation with its principal place of business at 30-2, Shimomaruko 3-Chome, Ohta-Ku, Tokyo, Japan 146-8501. Canon Kabushiki Kaisha distributes its products in the United States through its wholly-owned subsidiary, Canon U.S.A., Inc., a New York corporation.

10. Defendants are a collection of individuals and entities, both known and unknown, who conspired and operated in concert with each other to engage in the counterfeiting scheme alleged in this Complaint. Defendants are the individuals who operated, controlled, and/or were responsible for the selling accounts detailed in **Schedule 1**, attached hereto (“Defendants’ Selling Accounts” or “Selling Accounts”). On information and belief, in many cases, Defendants took intentional and affirmative steps to hide their true identities and whereabouts from Amazon and Canon by using falsified and/or fraudulent identity documents and information to conduct their activities and to circumvent Amazon’s robust verification processes. Defendants are subject to liability for their wrongful conduct both directly and under principles of secondary liability including, without limitation, *respondeat superior*, vicarious liability, and/or contributory infringement.

11. On information and belief, Defendant Cihan Akgoz (“Akgoz”) is an individual residing in Istanbul, Turkey, who personally participated in and/or had the right and ability to supervise, direct, and control the wrongful conduct alleged in this Complaint, and who derived a direct financial benefit from that wrongful conduct. Defendant Akgoz controlled and operated the Karsiyer Selling Account. On further information and belief, Defendant Akgoz acted in concert with individuals and/or entities who operated the other Selling Accounts listed in Schedule 1.

12. On information and belief, Defendant Umut Altan a/k/a Umut Alan (“Altan”) is an individual residing in Istanbul, Turkey, or Mardin, Turkey, who personally participated in and/or had the right and ability to supervise, direct, and control the wrongful conduct alleged in this Complaint, and who derived a direct financial benefit from that wrongful conduct. Defendant Altan controlled and operated the B2B Wholesale LLC, Beast and Edge LLC, Bold Beacon LLC, Creative Catalyst LLC, DA Company, Ellevana LLC, Lake Falls, Leapable LLC , and Malaro LLC Selling Accounts. On further information and belief, Defendant Altan acted in concert with individuals and/or entities who operated the other Selling Accounts listed in Schedule 1.

13. On information and belief, Defendant Yildiz Bayram (“Bayram”) is an individual residing in Kahramanmaras, Turkey, who personally participated in and/or had the right and ability to supervise, direct, and control the wrongful conduct alleged in this Complaint, and who derived a direct financial benefit from that wrongful conduct. Defendant Bayram controlled and operated the Erhan Turan Selling Account. On further information and belief, Defendant Bayram acted in concert with individuals and/or entities who operated the other Selling Accounts listed in Schedule 1.

14. On information and belief, Defendant Satuk Bugrahan Ozturk (“Ozturk”) is an individual residing in Montebello, New Mexico, who personally participated in and/or had the right and ability to supervise, direct, and control the wrongful conduct alleged in this Complaint, and who derived a direct financial benefit from that wrongful conduct. Defendant Ozturk controlled and operated the Budiertrllc and Lake Falls Selling Accounts. On further information and belief, Defendant Ozturk acted in concert with individuals and/or entities who operated the other Selling Accounts listed in Schedule 1.

15. On information and belief, Defendant Ferdi Celik (“F. Celik”) is an individual residing in Istanbul, Turkey, who personally participated in and/or had the right and ability to supervise, direct, and control the wrongful conduct alleged in this Complaint, and who derived a direct financial benefit from that wrongful conduct. Defendant F. Celik controlled and operated

1 the EFYC Shop LLC, Lake Falls, and Whiteacikgoz Selling Accounts. On further information
2 and belief, Defendant F. Celik in concert with individuals and/or entities who operated the other
3 Selling Accounts listed in Schedule 1.

4 16. On information and belief, Defendant Ibrahim Celik (“I. Celik”) is an individual
5 residing in Bagcilar, Turkey, who personally participated in and/or had the right and ability to
6 supervise, direct, and control the wrongful conduct alleged in this Complaint, and who derived a
7 direct financial benefit from that wrongful conduct. Defendant I. Celik controlled and operated
8 the BlackWhiteShop1 Selling Account. On further information and belief, Defendant I. Celik
9 acted in concert with individuals and/or entities who operated the other Selling Accounts listed in
10 Schedule 1.

11 17. On information and belief, Defendant Alona Hurniak (“Hurniak”) is an individual
12 residing in Vasytkiv, Ukraine, who personally participated in and/or had the right and ability to
13 supervise, direct, and control the wrongful conduct alleged in this Complaint, and who derived a
14 direct financial benefit from that wrongful conduct. Defendant Hurniak controlled and operated
15 the Zelssi Selling Account. On further information and belief, Defendant Hurniak acted in
16 concert with individuals and/or entities who operated the other Selling Accounts listed in
17 Schedule 1.

18 18. On information and belief, Defendant Zekeriya Keskin (“Keskin”) is an
19 individual residing in either Edirne or Istanbul, Turkey, who personally participated in and/or
20 had the right and ability to supervise, direct, and control the wrongful conduct alleged in this
21 Complaint, and who derived a direct financial benefit from that wrongful conduct. Defendant
22 Keskin controlled and operated the Mundsy and Zelssi Selling Accounts. On further information
23 and belief, Defendant Keskin acted in concert with individuals and/or entities who operated the
24 other Selling Accounts listed in Schedule 1.

25 19. On information and belief, Defendant Pavlo Poperechniuk (“Poperechniuk”) is an
26 individual residing in Koshelivka, Ukraine, who personally participated in and/or had the right
27 and ability to supervise, direct, and control the wrongful conduct alleged in this Complaint, and

1 who derived a direct financial benefit from that wrongful conduct. Defendant Poperechniuk
2 controlled and operated the Lake Falls Selling Account. On further information and belief,
3 Defendant Poperechniuk acted in concert with individuals and/or entities who operated the other
4 Selling Accounts listed in Schedule 1.

5 20. On information and belief, Defendant Varvara Sukachova (“Sukachova”) is an
6 individual residing in Marhanets, Ukraine, who personally participated in and/or had the right
7 and ability to supervise, direct, and control the wrongful conduct alleged in this Complaint, and
8 who derived a direct financial benefit from that wrongful conduct. Defendant Sukachova
9 controlled and operated the Alona Hurniak, BHT Products, DA Company, and Mundszy Selling
10 Accounts. On further information and belief, Defendant Sukachova acted in concert with
11 individuals and/or entities who operated the other Selling Accounts listed in Schedule 1.

12 21. On information and belief, Defendant Batuhan Terzi (“Terzi”) is an individual
13 residing in Eskisehir, Turkey, who personally participated in and/or had the right and ability to
14 supervise, direct, and control the wrongful conduct alleged in this Complaint, and who derived a
15 direct financial benefit from that wrongful conduct. Defendant Terzi controlled and operated the
16 Alona Hurniak Selling Account. On further information and belief, Defendant Terzi acted in
17 concert with individuals and/or entities who operated the other Selling Accounts listed in
18 Schedule 1.

19 22. On information and belief, Defendant Medeni Uludag (“Uludag”) is an individual
20 residing in Istanbul, Turkey, who personally participated in and/or had the right and ability to
21 supervise, direct, and control the wrongful conduct alleged in this Complaint, and who derived a
22 direct financial benefit from that wrongful conduct. Defendant Uludag controlled and operated
23 the BlackWhiteShop1 Selling Account. On further information and belief, Defendant Uludag
24 acted in concert with individuals and/or entities who operated the other Selling Accounts listed in
25 Schedule 1.

26 23. On information and belief, Defendant Yigit Can Celenogu (“Celenogu”) is an
27 individual residing in Albuquerque, New Mexico, who personally participated in and/or had the

1 right and ability to supervise, direct, and control the wrongful conduct alleged in this Complaint,
2 and who derived a direct financial benefit from that wrongful conduct. Defendant Celenogu
3 controlled and operated the Lake Falls Selling Account. On further information and belief,
4 Defendant Celenogu acted in concert with individuals and/or entities who operated the other
5 Selling Accounts listed in Schedule 1.

6 24. On information and belief, Defendants Does 1-10 (the “Doe Defendants”) are
7 individuals and/or entities working in active concert with each other and the named Defendants
8 to knowingly and willfully manufacture, import, advertise, market, offer, distribute, and sell
9 counterfeit Canon products. The identities of the Doe Defendants are presently unknown to
10 Plaintiffs.

11 **III. JURISDICTION AND VENUE**

12 25. The Court has subject matter jurisdiction over Canon’s Lanham Act claim for
13 trademark counterfeiting and trademark infringement, and Amazon’s and Canon’s Lanham Act
14 claims for false designation of origin, pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and
15 1338(a). The Court has subject matter jurisdiction over Amazon’s breach of contract claim and
16 Amazon’s and Canon’s claims for violation of the Washington Consumer Protection Act,
17 pursuant to 28 U.S.C. §§ 1332 and 1367.

18 26. The Court has personal jurisdiction over Defendants because they transacted
19 business and committed tortious acts within and directed to the State of Washington, and
20 Amazon’s and Canon’s claims arise from those activities. Defendants affirmatively undertook to
21 do business with Amazon, a corporation with its principal place of business in Washington, and
22 sold in the Amazon Store products bearing counterfeit versions of the Canon Trademarks and
23 which otherwise infringed Canon’s IP. Additionally, Defendants shipped products bearing
24 counterfeit versions of the Canon Trademarks to consumers in Washington. Each Defendant
25 committed, or facilitated the commission of, tortious acts in Washington and has wrongfully
26 caused Amazon and Canon substantial injury in Washington.

27. Further, named Defendants have consented to the jurisdiction of this Court by agreeing to the Amazon Services Business Solutions Agreement (“BSA”), which provides that the “Governing Courts” for claims to enjoin infringement or misuse of IP rights and claims related to the sale of counterfeit products in the Amazon Store are the state or federal courts located in King County, Washington.

28. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because a substantial part of the events giving rise to the claims occurred in the Western District of Washington. Venue is also proper in this Court because Defendants consented to it under the BSA.

29. Pursuant to Local Civil Rule 3(e), intra-district assignment to the Seattle Division is proper because the claims arose in this Division, where (a) Amazon resides, (b) injuries giving rise to suit occurred, and (c) Defendants directed their unlawful conduct.

IV. FACTS

A. Amazon’s Efforts to Prevent the Sale of Counterfeit Goods.

30. Amazon works hard to build and protect the reputation of its stores as places where customers can conveniently select from a wide array of authentic goods and services at competitive prices. Amazon invests vast resources to ensure that when customers make purchases in Amazon’s stores—either directly from Amazon entities or from one of its millions of third-party sellers—customers receive authentic products made by the true manufacturer of those products.

31. A small number of bad actors seek to take advantage of the trust customers place in Amazon by attempting to create Amazon selling accounts to advertise, market, offer, distribute, and sell counterfeit products. These bad actors seek to misuse and infringe the trademarks and other IP of the true manufacturers of those products to deceive Amazon and its customers. This unlawful and expressly prohibited conduct undermines the trust that customers, sellers, and manufacturers place in Amazon, and tarnishes Amazon’s brand and reputation, thereby causing irreparable harm to Amazon.

32. Amazon prohibits the sale of inauthentic and fraudulent products and is constantly innovating on behalf of its customers and working with brands, manufacturers, rights owners, and others to improve the detection and prevention of counterfeit products from ever being offered to customers in Amazon's stores. Amazon employs dedicated teams of software engineers, research scientists, program managers, and investigators to prevent counterfeits from being offered in Amazon's stores. Amazon's systems automatically and continuously scan thousands of data points to prevent, detect, and remove counterfeits from its stores and to terminate the selling accounts of bad actors before they can offer counterfeit products. When Amazon identifies issues based on this feedback, it takes action to address them. Amazon also uses this intelligence to improve its proactive prevention controls. In 2023, Amazon's proactive controls blocked more than 99% of suspected infringing listings before a brand ever had to find and report them.

33. In 2017, Amazon launched Brand Registry, a free service that offers rights owners an enhanced suite of tools for monitoring and reporting potential instances of infringement, regardless of their relationship with Amazon. Brand Registry delivers automated brand protections that use machine learning to predict infringement and proactively protect brands' IP. Brand Registry also provides a powerful Report a Violation Tool that allows brands to search for, identify, and report potentially infringing products using state-of-the-art image search technology.

34. In 2018, Amazon launched Transparency, a product serialization service that effectively eliminates counterfeits for enrolled products. Brands enrolled in Transparency can apply a unique 2D code to every unit they manufacture, which allows Amazon, other retailers, law enforcement, and customers to determine the authenticity of any Transparency-enabled product, regardless of where the product was purchased. More than 1.6 billion product units, whether sold in Amazon's stores or elsewhere in the retail supply chain, have been enrolled in Transparency, and have been authenticated as genuine through code scan verification.

35. In 2019, Amazon launched Project Zero, a program to empower brands to help Amazon drive counterfeits to zero. Project Zero introduced a novel self-service counterfeit removal tool that enables brands to remove counterfeit listings directly from Amazon's stores. This enables brands to take down counterfeit product offerings on their own within minutes. Since launch, more than 25,000 brands have enrolled in Project Zero.

36. Amazon uses advanced technology and expert human reviewers to verify the identities of potential sellers. When prospective sellers apply to sell in Amazon's stores, they are required to provide a form of government-issued photo ID, along with other information about their business. Amazon employs advanced identity detection methods such as document forgery detection, image and video verification, and other technologies to quickly confirm the authenticity of government-issued IDs and whether such IDs match the individual applying to sell in Amazon's stores. In addition to verifying IDs, Amazon's systems analyze numerous data points, including behavior signals and connections to previously detected bad actors, to detect and prevent risks.

37. Similarly, throughout the selling experience in Amazon's stores, Amazon's systems monitor selling accounts to identify anomalies or changes in account information, behaviors, and other risk signals. In the event that Amazon identifies a risk of fraud or abuse, it promptly initiates an investigation using automated and/or human review, may request additional information, and swiftly removes bad actors from its stores. In addition to the measures discussed above, Amazon actively cooperates with rights owners and law enforcement to identify and prosecute bad actors suspected of engaging in illegal activity. Lawsuits, like this one, as well as criminal referrals, are integral components of Amazon's efforts to combat counterfeits and other inauthentic products.

B. Canon and Its Anti-Counterfeiting Efforts.

38. Continually, and for a long time prior to Defendants' infringing actions, Canon has distributed and sold a wide range of printers and toner cartridges, as well as a wide variety of other high-quality products, all of which bear the Canon Trademarks. These products have been

1 and are now extensively advertised through television, magazines, newspapers, brochures, trade
2 shows, and other means.

3 39. Continually, and for a long time prior to Defendants' infringing actions, Canon
4 has been and is now marketing, offering for sale, and selling Canon printers and toner cartridges
5 bearing the Canon Trademarks in the State of Washington and elsewhere in interstate commerce.
6 Through Canon's extensive sales of Canon printers and toner cartridges, the public has come to
7 recognize Canon printers and toner cartridges as being of excellent quality and reputation.

8 40. Canon's advertising and promotional activities involving products bearing the
9 Canon Trademarks have been continuous and have been for the purpose of acquainting the
10 public with the excellent quality of Canon's products so that consumers may, with knowledge
11 and confidence, purchase and use products bearing these marks. As a result, Canon printers and
12 toner cartridges bearing the Canon Trademarks are well known, and the Canon Trademarks have
13 come to be and are recognized by the public as indicating that the products bearing the Canon
14 Trademarks originate with Canon.

15 41. By reason of their high quality and as a result of Canon's continued and extensive
16 sales, advertising, and promotion, Canon printers and toner cartridges sold under the Canon
17 Trademarks enjoy an excellent reputation among the public. The Canon Trademarks'
18 registrations and the associated goodwill that has accrued to the Canon Trademarks are of great
19 value to Canon in the conduct of its business.

20 42. Canon is currently enrolled in Brand Registry and Project Zero.

21 43. In addition, Canon operates a worldwide anti-counterfeiting program and
22 regularly investigates suspicious sellers that are identified through proactive internet monitoring
23 or are reported through Canon's distribution network.

24 **C. Defendants Created Amazon Selling Accounts, Agreed Not to Sell**
25 **Counterfeit Goods, and Agreed to Provide Accurate Information to Amazon.**

26 44. At various times between September 7, 2011 and June 21, 2024, Defendants
27 established, controlled, and operated the 19 Selling Accounts detailed in Schedule 1, through

1 which they sought to advertise, market, offer, distribute, and sell counterfeit Canon products. In
2 connection with these Selling Accounts, Defendants provided Amazon with names, email
3 addresses, phone numbers, tax identification numbers, bank information, and either government-
4 issued identification for an individual acting on behalf of the Selling Account or a copy of a
5 government-issued record or tax document for the entity operating the Selling Account. Plaintiffs
6 were able to identify Defendants as the primary recipients of the proceeds of the counterfeiting
7 sales for their respective Selling Accounts based on investigation of certain financial information
8 that Defendants provided to Amazon. In the course of their investigation, Plaintiffs determined
9 that certain Defendants took active steps to mislead Amazon, circumvent Amazon's robust
10 verification processes, and conceal their true locations and identities by providing falsified
11 and/or fraudulent identity documents and information in connection with the Selling Accounts.

12 45. To become a third-party seller in the Amazon Store, sellers are required to agree
13 to the BSA, which governs the applicant's access to and use of Amazon's services and states
14 Amazon's rules for selling in the Amazon Store. By entering into the BSA, each seller represents
15 and warrants that it "will comply with all applicable Laws in [the] performance of its obligations
16 and exercise of its rights" under the BSA. A true and correct copy of the applicable versions of
17 the BSA, namely, the versions Defendants last agreed to when using Amazon's services, is
18 attached as **Exhibit B**.

19 46. Under the terms of the BSA, Amazon specifically identifies the sale of counterfeit
20 goods as "deceptive, fraudulent, or illegal activity" in violation of Amazon's policies, reserving
21 the right to withhold payments and terminate the selling account of any bad actor who engages in
22 such conduct. Ex. B, ¶¶ 2-3. The BSA requires the seller to defend, indemnify, and hold Amazon
23 harmless against any claims or losses arising from the seller's "actual or alleged infringement of
24 any Intellectual Property Rights." *Id.* ¶ 6.1.

25 47. Additionally, the BSA incorporates, and sellers therefore agree to be bound by,
26 Amazon's Anti-Counterfeiting Policy, the applicable version of which is attached as **Exhibit C**.

1 The Anti-Counterfeiting Policy expressly prohibits the sale of counterfeit goods in the Amazon
2 Store:

- 3 • The sale of counterfeit products is strictly prohibited.
- 4 • You may not sell any products that are not legal for sale, such as products that
5 have been illegally replicated, reproduced, or manufactured[.]
- 6 • You must provide records about the authenticity of your products if Amazon
7 requests that documentation[.]

8 Failure to abide by this policy may result in loss of selling privileges, funds being
9 withheld, destruction of inventory in our fulfillment centers, and other legal
10 consequences.

11 *Id.*

12 48. Amazon's Anti-Counterfeiting Policy further describes Amazon's commitment to
13 preventing the sale and distribution of counterfeit goods in the Amazon Store together with the
14 consequences of selling inauthentic products:

- 15 • Sell Only Authentic and Legal Products. It is your responsibility to source,
16 sell, and fulfill only authentic products that are legal for sale. Examples of
17 prohibited products include:
 - 18 ○ Bootlegs, fakes, or pirated copies of products or content
 - 19 ○ Products that have been illegally replicated, reproduced, or manufactured
 - 20 ○ Products that infringe another party's intellectual property rights
- 21 • Maintain and Provide Inventory Records. Amazon may request that you
22 provide documentation (such as invoices) showing the authenticity of your
23 products or your authorization to list them for sale. You may remove pricing
24 information from these documents, but providing documents that have been
25 edited in any other way or that are misleading is a violation of this policy and
26 will lead to enforcement against your account.
- 27 • Consequences of Selling Inauthentic Products. If you sell inauthentic
products, we may immediately suspend or terminate your Amazon selling
account (and any related accounts), destroy any inauthentic products in our
fulfillment centers at your expense, and/or withhold payments to you.
- Amazon Takes Action to Protect Customers and Rights Owners. Amazon also
works with manufacturers, rights holders, content owners, vendors, and
sellers to improve the ways we detect and prevent inauthentic products from
reaching our customers. As a result of our detection and enforcement
activities, Amazon may:
 - Remove suspect listings.

○ Take legal action against parties who knowingly violate this policy and harm our customers. In addition to criminal fines and imprisonment, sellers and suppliers of inauthentic products may face civil penalties including the loss of any amounts received from the sale of inauthentic products, the damage or harm sustained by the rights holders, statutory and other damages, and attorney's fees.

- Reporting Inauthentic Products. We stand behind the products sold on our site with our A-to-z Guarantee, and we encourage rights owners who have product authenticity concerns to notify us. We will promptly investigate and take all appropriate actions to protect customers, sellers, and rights holders. You may view counterfeit complaints on the Account Health page in Seller Central.

Id.

49. Additionally, under the terms of the BSA, sellers agree that the information and documentation they provide to Amazon in connection with their selling accounts—such as identification, contact, and banking information—will, at all times, be valid, truthful, accurate, and complete. Specifically, the BSA requires that:

- As part of the application process, you must provide us with your (or your business') legal name, address, phone number and e-mail address, as well as any other information we may request. Ex. B. ¶ 1.
- You will use only a name you are authorized to use in connection with a[ny Amazon] Service and will update all of the information you provide to us in connection with the Services as necessary to ensure that it at all times remains accurate, complete, and valid. *Id.* ¶ 2.
- Each party represents and warrants that: (a) if it is a business, it is duly organized, validly existing and in good standing under the Laws of the country in which the business is registered and that you are registering for the Service(s) within such country; (b) it has all requisite right, power, and authority to enter this Agreement, perform its obligations, and grant the rights, licenses, and authorizations in this Agreement; (c) any information provided or made available by one party to another party or its Affiliates is at all times accurate and complete[.] *Id.* ¶ 5.

50. When Defendants registered as third-party sellers in the Amazon Store, and established their Selling Accounts, they agreed not to advertise, market, offer, distribute, or sell counterfeit products, and agreed to provide Amazon with accurate and complete information and to ensure that information remained as such.

D. Defendants' Sale of Counterfeit Canon Products and Provision of False Information to Amazon.

51. Defendants fraudulently created Selling Accounts and advertised, marketed, offered, distributed, and sold counterfeit Canon-branded products in the Amazon Store. The counterfeit Canon-branded products sold by Defendants are identified and described in Schedule 1.

52. Canon has conducted multiple test purchases and/or reviewed physical samples and/or images of Canon-branded products sold by Defendants' Selling Accounts and determined that the products are counterfeit, that each bears a counterfeit Canon Trademark, and that Canon has never authorized the sale of such products, as detailed in Schedule 1.

53. In addition, as further detailed in Schedule 1, certain Defendants submitted falsified invoices to Amazon which purported to show that their counterfeit products came from a supplier of authentic products.

54. Defendants, with full knowledge of the distinctiveness and widespread recognition of the Canon Trademarks, are promoting and selling to the public counterfeit and infringing Canon products that bear false reproductions of the Canon Trademarks. Canon has never authorized or consented in any way to the use of Canon Trademarks on any of Defendants' products, nor has Canon granted any license to Defendants allowing such use.

55. Defendants have counterfeited the Canon Trademarks by marketing and selling counterfeit and infringing Canon products in the identical color and logo style as that used by Canon for the Canon Trademarks.

56. Defendants' conduct is intentionally fraudulent, malicious, willful, and wanton, and poses a threat of damage to the consuming public because counterfeit and infringing products can cause serious accidents and injuries.

57. Defendants' conduct is causing immediate and irreparable injury to Canon and Amazon and to their goodwill and reputation and will continue both to damage Canon and

1 Amazon and to deceive the public unless preliminarily and permanently enjoined by this Court.
2 Canon and Amazon have no adequate remedy at law.

3 **E. Defendants' Coordinated Sale of Counterfeit Canon Products.**

4 58. On information and belief, Defendants operated in concert with one another in
5 their advertising, marketing, offering, distributing, and selling of inauthentic Canon-branded
6 products. Defendants are associated through common physical addresses, phone numbers, bank
7 accounts, and/or similar falsified invoices provided to Amazon or used to access their Selling
8 Accounts, and through common Internet Protocol networks and addresses used to access those
9 Selling Accounts.

10 **F. Amazon Shut Down Defendants' Selling Accounts.**

11 59. By selling counterfeit and infringing Canon products, Defendants falsely
12 represented to Amazon and its customers that the products Defendants sold were genuine
13 products made by Canon. Defendants also knowingly and willfully used Canon's IP in
14 connection with the advertising, marketing, offering, distributing, and selling of counterfeit and
15 infringing Canon products.

16 60. At all times, Defendants knew they were prohibited from violating third-party IP
17 rights or any applicable laws while selling products in the Amazon Store, from providing
18 inaccurate information to Amazon and its customers, from misrepresenting the authenticity of
19 the products sold, and from misleading Amazon and its customers through their sale of
20 inauthentic Canon products. Defendants have breached the terms of their agreements with
21 Amazon, deceived Amazon's customers and Amazon, infringed and misused the IP rights of
22 Canon, harmed the integrity of and customer trust in the Amazon Store, and tarnished Amazon's
23 and Canon's brands.

24 61. After Amazon verified Defendants' sale of counterfeit Canon products, it blocked
25 Defendants' Selling Accounts. In doing so, Amazon exercised its rights under the BSA to protect
26 its customers and the reputations of Amazon and Canon.
27

62. Pursuant to Amazon's A-to-z guarantee, Amazon also proactively issued full refunds to customers who purchased purported Canon products from Defendants. Defendants have not reimbursed Amazon.

V. CLAIMS

FIRST CLAIM

(by Canon against all Defendants)

Trademark Counterfeiting and Trademark Infringement – 15 U.S.C. § 1114

63. Plaintiff Canon incorporates by reference the allegations of the preceding paragraphs as though set forth herein.

64. Defendants' activities constitute counterfeiting and infringement of the Canon Trademarks as described in the paragraphs above.

65. Canon owns the Canon Trademarks and advertises, markets, offers, distributes, and sells its products using the Canon Trademarks described above and uses those trademarks to distinguish its products from the products and related items of others in the same or related fields.

66. Because of Canon's long, continuous, and exclusive use of the Canon Trademarks identified in this Complaint, the trademarks have come to mean, and are understood by customers and the public to signify, products from Canon.

67. Defendants unlawfully advertised, marketed, offered, distributed, and sold products bearing counterfeit and infringing versions of the Canon Trademarks with the intent and likelihood of causing customer confusion, mistake, and deception as to the products' source, origin, and authenticity. Specifically, Defendants intended customers to believe, incorrectly, that the products originated from, were affiliated with, and/or were authorized by Canon and likely caused such erroneous customer beliefs.

68. As a result of Defendants' wrongful conduct, Canon is entitled to recover its actual damages, Defendants' profits attributable to the infringement, treble damages, and attorneys' fees pursuant to 15 U.S.C. § 1117(a) and (b). Alternatively, Canon is entitled to statutory damages under 15 U.S.C. § 1117(c) for Defendants' use of counterfeit marks.

69. Canon is further entitled to injunctive relief, including an order impounding all counterfeit and infringing products and promotional materials in Defendants' possession. Canon has no adequate remedy at law for Defendants' wrongful conduct because, among other things: (a) the Canon Trademarks are unique and valuable properties that have no readily-determinable market value; (b) Defendants' counterfeiting and infringing activities constitute harm to Canon and Canon's reputation and goodwill such that Canon could not be made whole by any monetary award; (c) if Defendants' wrongful conduct is allowed to continue, the public is likely to become further confused, mistaken, or deceived as to the source, origin, or authenticity of the counterfeit and infringing materials; and (d) the resulting harm to Canon, due to Defendants' wrongful conduct is likely to be continuing.

SECOND CLAIM

(by Canon and Amazon against all Defendants)
False Designation of Origin – 15 U.S.C. § 1125(a)

70. Plaintiffs incorporate by reference the allegations of the preceding paragraphs as though set forth herein.

71. Canon owns the Canon Trademarks and advertises, markets, offers, distributes, and sells its products using those trademarks described above and uses the trademarks to distinguish its products from the products and related items of others in the same or related fields.

72. Because of Canon's long, continuous, and exclusive use of the Canon Trademarks identified in this Complaint, the trademarks have come to mean, and are understood by customers, users, and the public, to signify products from Canon.

73. Amazon's reputation for trustworthiness is at the heart of its relationship with customers. Defendants' actions in selling counterfeits pose a threat to Amazon's reputation because they undermine and jeopardize customer trust in the Amazon Store.

74. Defendants' unlawfully advertised, marketed, offered, distributed, and sold products bearing counterfeit versions of the Canon Trademarks with the intent and likelihood of causing customer confusion, mistake, and deception as to the products' source, origin, and

1 authenticity. Upon information and belief, Defendants' wrongful conduct misleads and confuses
2 customers and the public as to the origin and authenticity of the goods and services advertised,
3 marketed, offered, distributed, or sold in connection with the Canon Trademarks and wrongfully
4 trades upon Canon's goodwill and business reputation.

5 75. Further, Defendants deceived Amazon and its customers about the authenticity of
6 the products they were advertising, marketing, offering, distributing, and selling, in direct and
7 willful violation of the BSA and Amazon's Anti-Counterfeiting Policies. Defendants' deceptive
8 acts were material to Amazon's decision to allow Defendants to sell their products in the
9 Amazon Store because Amazon would not have allowed Defendants to do so but for their
10 deceptive acts.

11 76. Defendants' misconduct has also caused Amazon to expend significant resources
12 to investigate and combat Defendants' wrongdoing and to bring this lawsuit to prevent
13 Defendants from causing further harm to Amazon and its customers. Defendants' illegal acts
14 have caused irreparable injury to Amazon and, on information and belief, that injury is ongoing
15 at least to the extent that Defendants continue to establish selling accounts under different or
16 false identities. An award of monetary damages alone cannot fully compensate Amazon for its
17 injuries, and thus Amazon lacks an adequate remedy at law.

18 77. Defendants' conduct constitutes (a) false designation of origin, (b) false or
19 misleading description, and (c) false or misleading representation that products originate from or
20 are authorized by Canon, all in violation of 15 U.S.C. § 1125(a)(1)(A).

21 78. Plaintiffs are entitled to an injunction against Defendants, their officers, agents,
22 servants, employees, and attorneys, and all other persons in active concert or participation with
23 them, as set forth in the Prayer for Relief below, along with attorneys' fees and costs in
24 investigating and bringing this lawsuit. Defendants' acts have caused irreparable injury to
25 Plaintiffs. On information and belief, that injury is continuing. An award of monetary damages
26 cannot fully compensate Plaintiffs for their injuries, and Plaintiffs lacks an adequate remedy at
27 law.

79. Canon is further entitled to recover Defendants' profits, Canon's damages for its losses, and Canon's costs to investigate and remediate Defendants' conduct and bring this action, in an amount to be determined. Canon is also entitled to the trebling of any damages award as allowed by law. Likewise, Amazon is also entitled to recover its damages arising from Defendants' sale of counterfeit products in the Amazon Store.

THIRD CLAIM

(by Canon and Amazon against all Defendants)

Violation of Washington Consumer Protection Act, RCW 19.86.010, et seq.

80. Plaintiffs incorporate by reference the allegations of the preceding paragraphs as though set forth herein.

81. Defendants' advertising, marketing, offering, distributing, and selling of counterfeit Canon products constitute unfair and deceptive acts or practices in the conduct of trade or commerce, in violation of RCW 19.86.020.

82. Defendants' advertising, marketing, offering, distributing, and selling of counterfeit Canon products harm the public interest by deceiving customers about the authenticity, origins, and sponsorship of the products.

83. Defendants' advertising, marketing, offering, distributing, and selling of counterfeit Canon products directly and proximately causes harm to and tarnishes Plaintiffs' reputations and brands, and damages their business and property interests and rights.

84. Accordingly, Plaintiffs seek to enjoin further violations of RCW 19.86.020 and recover from Defendants their attorneys' fees and costs. Canon further seeks to recover from Defendants its actual damages, trebled, and Amazon further seeks to recover from Defendants its actual damages, trebled, regarding Defendants' activities involving the sale of counterfeit products.

FOURTH CLAIM

(by Amazon.com Services LLC¹ against all Defendants)

Breach of Contract

85. Plaintiff Amazon incorporates by reference the allegations of the preceding

¹ For the Fifth Claim only, "Amazon" shall refer to Amazon.com Services LLC only.

1 paragraphs as though set forth herein.

2 86. Defendants established Amazon selling accounts and entered into Amazon's
3 BSA, a binding and enforceable contract between Defendants and Amazon. Defendants also
4 contractually agreed to be bound by the policies incorporated by reference into the BSA,
5 including Amazon's Anti-Counterfeiting Policy and other policies as maintained on the Amazon
6 seller website.

7 87. Amazon performed all obligations required of it under the terms of the contract
8 with Defendants or was excused from doing so.

9 88. Defendants' sale and distribution of counterfeit Canon products materially
10 breached the BSA and the Anti-Counterfeiting Policy in numerous ways. Among other things,
11 Defendants' conduct constitutes infringement and misuse of the IP rights of Canon.

12 89. In furtherance of their sale and distribution of counterfeit Canon products, certain
13 Defendants further breached the BSA and its incorporated policies by submitting falsified
14 documents to Amazon in order to obtain approval to sell the products in the Amazon Store, and
15 submitted falsified documents to Amazon again after their Selling Accounts were suspended in
16 an effort to have their Accounts reinstated.

17 90. Likewise, in furtherance of their counterfeiting activities, Defendants materially
18 breached the BSA and its incorporated policies by providing Amazon with false, fraudulent, or
19 otherwise inaccurate identification, contact, and/or banking information in connection with their
20 Selling Accounts, and by failing to update that information such to cure its inaccuracies.

21 91. Defendants' breaches have caused significant harm to Amazon, and Amazon is
22 entitled to damages in an amount to be determined.

23 VI. PRAYER FOR RELIEF

24 WHEREFORE, Plaintiffs respectfully pray for the following relief:

25 A. That the Court enter an order permanently enjoining Defendants, their officers,
26 agents, representatives, servants, employees, successors, assigns and attorneys, and all others in
27 active concert or participation with them, from:

- (i) selling counterfeit or infringing products in Amazon's stores;
- (ii) selling counterfeit or infringing products to Amazon or any Amazon affiliate;
- (iii) importing, manufacturing, producing, distributing, circulating, offering to sell, selling, advertising, promoting, or displaying any product or service using any simulation, reproduction, counterfeit, copy, or colorable imitation of Canon's brand or trademarks, or which otherwise infringes Canon's IP, in any store or in any medium;
- (iv) engaging in any other activity constituting an infringement of the Canon Trademarks or Canon's rights in or right to exploit the same;
- (v) engaging in further acts of unfair competition arising from the Defendant's unlawful and improper adoption and use of Canon's trade dress and style; and
- (vi) assisting, aiding, or abetting any other person or business entity in engaging in or performing any of the activities referred to in subparagraphs (i) through (v) above;

B. That the Court enter judgment in Plaintiffs' favor on all claims brought by them;

C. That the Court enter an order pursuant to 15 U.S.C. § 1118 impounding and permitting destruction of all counterfeit and infringing products bearing the Canon Trademarks or that otherwise infringe Canon's IP, and any related materials, including business records and materials used to reproduce any infringing products, in Defendants' possession or under their control;

D. That the Court enter an order requiring Defendants to provide Plaintiffs a full and complete accounting of all amounts due and owing to Plaintiffs as a result of Defendants' unlawful activities and requiring Defendants to identify their suppliers of counterfeit and infringing products bearing the Canon trademarks;

1 E. That the Court enter an order requiring Defendants to pay all general, special, and
2 actual damages which Canon has sustained, or will sustain as a consequence of Defendants'
3 unlawful acts, plus Defendants' profits from the unlawful conduct described herein, together
4 with its statutory damages, and that such damages be enhanced, doubled, or trebled as provided
5 for by 15 U.S.C. § 1117, RCW 19.86.020, or otherwise allowed by law, and that Amazon's
6 damages, plus Defendants' profits, related to Defendants' activities involving the sale of
7 counterfeit products be enhanced, doubled, or trebled as provided for by 15 U.S.C. § 1117, RCW
8 19.86.020, or otherwise allowed by law;

9 F. That the Court enter an order requiring Defendants to pay the maximum amount
10 of prejudgment interest authorized by law;

11 G. That the Court enter an order requiring Defendants to pay the costs of this action
12 and Plaintiffs' reasonable attorneys' fees incurred in prosecuting this action, as provided for by
13 15 U.S.C. § 1117, RCW 19.86.020, or otherwise allowed by law;

14 H. That the Court enter an order requiring that identified financial institutions
15 restrain and transfer to Plaintiffs all amounts arising from Defendants' unlawful counterfeiting
16 activities as set forth in this lawsuit, up to a total amount necessary to satisfy monetary judgment
17 in this case; and

18 I. That the Court grant Plaintiffs such other, further, and additional relief as the
19 Court deems just and equitable.

20
21 DATED this 1st day of October, 2024.

22 DAVIS WRIGHT TREMAINE LLP
23 *Attorneys for Plaintiffs*

24 *s/ Scott Commerson*

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26 865 South Figueroa Street, Suite 2400
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s/ Lauren Rainwater

Lauren Rainwater, WSBA #43625

920 Fifth Avenue, Suite 3300

Seattle, WA 98104-1604

Tel: (206) 622-3150

Fax: (206) 757-7700

Email: laurenrainwater@dwt.com

SCHEDULE 1**DEFENDANT 1:** Cihan AkgozSelling Account Name: Karsiyer¹

Dates of Known Sales of Infringing Products: 7/5/2023 – 10/22/2023

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner, Cartridge 104 Black (0263B001), 1 Pack, for Canon imageCLASS D420, D480, MF4150d, MF4270dn, MF4350d, MF4370dn, MF4690 Laser Printer and FAXPHONE L120, L90</p> <p>ASIN²: B000B02BEM</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p>	<ul style="list-style-type: none"> On or about October 11, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the test-purchased product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.
<p>Canon Genuine Toner Cartridge 128 Black (3500B001), 1-Pack imageCLASS MF4450, MF4500/4700/4800 Series, D500 Series, L100, L190 Laser Printer</p> <p>ASIN: B0041RRMQS</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p>	<ul style="list-style-type: none"> On or about October 11, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the test-purchased product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.

¹ Where the same Selling Account was controlled and operated by multiple Defendants, it is listed under each Defendant's name.

² "ASIN" is an abbreviation of "Amazon Standard Identification Number," which is a unique series of ten alphanumeric characters that is assigned to each product listed for sale in Amazon's stores for identification purposes.

<p>Canon Genuine Toner, Cartridge 046 Black, High Capacity (1254C001), 1 Pack Color imageCLASS MF735Cdw, MF733Cdw, MF731Cdw, LBP654Cdw Laser Printer</p> <p>ASIN: B06XXKNV2T</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> • On or about October 11, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. • Canon received and inspected the test-purchased product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.
<p>Canon Genuine-Drum, Cartridge 051 Black (2170C001), 1 Pack, for Canon imageCLASS MF269dw, MF267dw, MF264dw, LBP162dw Laser Printers</p> <p>ASIN: B07BFF7XJK</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> • On or about October 11, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. • Canon received and inspected the test-purchased product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.
<p>Canon Genuine Toner, Cartridge 047 Black (2164C001), 1 Pack, for Canon imageCLASS LBP113w, MF113w Laser Printer</p> <p>ASIN: B07H9VPC1V</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> • On or about October 11, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. • Canon received and inspected the test-purchased product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.

<p>Canon Genuine Toner, Cartridge 054 Black (3024C001) 1 Pack Color imageCLASS MF641Cdw, MF642Cdw, MF644Cdw, LBP622Cdw Laser Printers</p> <p>ASIN: B07QDVH2RX</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about October 11, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the test-purchased product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.
<p>Canon Genuine Toner, Cartridge 054 Black, High Capacity (3028C001) 1 Pack Color imageCLASS MF641Cdw, MF642Cdw, MF644Cdw, LBP622Cdw Laser Printer, Black High Capacity</p> <p>ASIN: B07QFYHY72</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about October 11, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the test-purchased product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.
<p>Canon CRG-046 4-Color Complete Toner Cartridge Set</p> <p>ASIN: B07VGRJ3L8</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about October 11, 2023, Canon conducted a test purchases of the listed product sold by the bad actor. Canon received and inspected the test-purchased product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.
<p>Canon Genuine Toner Cartridge 057 Black (3009C001), 1-Pack imageCLASS MF449dw, MF448dw, MF445dw,</p>	<ul style="list-style-type: none"> On or about October 4, 2023, Canon conducted a test purchase of the listed product sold by the bad actor.

<p>LBP228dw, LBP227dw, LBP226dw Laser Printers, Standard</p> <p>ASIN: B07WWK22KW</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> • Canon received and inspected the test-purchased product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.
<p>Canon 045H Toner Cartridge Set for Color imageCLASS MF634Cdw, MF632Cdw - Cyan, Magenta and Yellow High Yield -3 Pack in Retail Packaging</p> <p>ASIN: B09B3WP7TS</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> • On or about October 11, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. • Canon received and inspected the test-purchased product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.

DEFENDANT 2: Umut Altan a/k/a Umut Alan

Selling Account Name: B2B Wholesale LLC

Dates of Known Sales of Infringing Products: 7/14/2023 – 8/15/2023

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner, Cartridge 054 Black, High Capacity (3028C001) 1 Pack Color imageCLASS MF641Cdw, MF642Cdw, MF644Cdw, LBP622Cdw Laser Printer, Black High Capacity</p> <p>ASIN: B07QFYHY72</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p>	<ul style="list-style-type: none"> • On or about January 3, 2024, Amazon sent to Canon a sample of the product sold by the bad actor. • Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. • Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was

U.S. Reg. No. 975,904 U.S. Reg. No. 4,903,423	fabricated based on deviations from an authentic invoice.
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Selling Account Name: Beast and Edge LLC

Dates of Known Sales of Infringing Products: 7/19/2023 – 8/1/2023

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner Cartridge 051 Black, High Capacity (2169C001), 1-Pack, for Canon imageCLASS MF264dw, MF267dw, MF269dw, LBP162dw Laser Printers</p> <p>ASIN: B07BFGJBMD</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about March 12, 2024, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample products and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

Selling Account Name: Bold Beacon LLC

Dates of Known Sales of Infringing Products: 7/17/2023 – 7/20/2023

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner Cartridge 057 Black, High Capacity (3010C001), 1-Pack imageCLASS MF449dw, MF448dw, MF445dw, LBP228dw, LBP227dw, LBP226dw Laser Printers (057 H)</p> <p>ASIN: B07WVFFTH7</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about March 8, 2024, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

Selling Account Name: Creative CatalystLLC

Dates of Known Sales of Infringing Products: 7/17/2023 – 7/25/2023

Purported Product	Confirmation of Counterfeit
<p>Canon 054 Toner Cartridge for imageCLASS LBP622Cdw and MF644cdw - Cyan, Magenta, Yellow, Black 4 Pack in Retail Packing</p> <p>ASIN: B09B2XB2SK</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about January 8, 2024, Amazon sent to Canon samples of the product sold by the bad actor. Canon received and inspected the sample products and confirmed that they are counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

Selling Account Name: DA Company

Dates of Known Sales of Infringing Products: 2/1/2022 – 11/27/2022

Purported Product	Confirmation of Counterfeit
<p>Canon CRG-046 4-Color Complete Toner Cartridge Set</p> <p>ASIN: B07VGRJ3L8</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about August 16, 2023, Amazon sent to Canon samples of the product sold by the bad actor. Canon received and inspected the sample products and confirmed that they are counterfeit based on deviations from Canon's authentic product and packaging.

Selling Account Name: Ellevana LLC

Dates of Known Sales of Infringing Products: 7/16/2023 – 7/25/2023


Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner Bundle 045 (1240C006), 1 Pack, for Canon Color imageCLASS MF634Cdw, MF632Cdw, LBP612Cdw Laser Printers</p> <p>ASIN: B07VJQ8Z5G</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about January 16, 2024, Amazon sent to Canon samples of the product sold by the bad actor. Canon received and inspected the sample products and confirmed that they are counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

Selling Account Name: Lake Falls

Dates of Known Sales of Infringing Products: 9/18/2023 – 3/2/2024

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner Cartridge 057 Black (3009C001), 1-Pack imageCLASS MF449dw, MF448dw, MF445dw, LBP228dw, LBP227dw, LBP226dw Laser Printers, Standard</p> <p>ASIN: B07WWK22KW</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about November 15, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

<p>Canon Genuine Toner Cartridge 137 Black (9435B001), 1-Pack ImageCLASS MF212w, MF216n, MF217w, MF244dw, MF247dw, MF249dw, MF227dw, MF229dw, MF232w, MF236n, LBP151dw, D570 Laser Printers</p> <p>ASIN: B00N99DC8Q</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about November 15, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.
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Selling Account Name: Leapable LLC 

Dates of Known Sales of Infringing Products: 7/16/2023 – 7/26/2023

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine 054 Complete 4-Color Toner Cartridge Set (CRG-054)</p> <p>ASIN: B084KHNZ86</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about January 4, 2024, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample products and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

Selling Account Name: Malaro LLC

Dates of Known Sales of Infringing Products: 6/23/2023 – 7/12/2023

Purported Product	Confirmation of Counterfeit
<p>Canon CRG-046 4-Color Complete Toner Cartridge Set</p> <p>ASIN: B07VGRJ3L8</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about March 15, 2024, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample products and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

DEFENDANT 3: Yildiz Bayram

Selling Account Name: Erhan Turan³

Dates of Known Sales of Infringing Products: 3/13/2023 – 4/24/2023

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner Cartridge 137 Black (9435B001), 1-Pack ImageCLASS MF212w, MF216n, MF217w, MF244dw, MF247dw, MF249dw, MF227dw, MF229dw, MF232w, MF236n, LBP151dw, D570 Laser Printers</p> <p>ASIN: B00N99DC8Q</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p>	<ul style="list-style-type: none"> On or about August 22, 2023, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

³ Erhan Turan was previously operated under the names Alma Drug LLC and MUND SY.

U.S. Reg. No. 4,903,423	
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DEFENDANT 4: Satuk Bugrahan Ozturk

Selling Account Name: Budierrllc

Dates of Known Sales of Infringing Products: 2/24/2022 – 2/23/2023

Purported Product	Confirmation of Counterfeit
Canon CRG-045 4-Color Complete Toner Cartridge Set ASIN: B075H8L653 Infringed Registrations: U.S. Reg. No. 1,315,232 U.S. Reg. No. 2,674,673 U.S. Reg. No. 975,904 U.S. Reg. No. 4,903,423	<ul style="list-style-type: none"> On or about September 12, 2023, Amazon sent to Canon samples of the product sold by the bad actor. Canon received and inspected the sample products and confirmed that they are counterfeit based on deviations from Canon's authentic product and packaging.

Selling Account Name: Lake Falls

Dates of Known Sales of Infringing Products: 9/18/2023 – 3/2/2024

Purported Product	Confirmation of Counterfeit
Canon Genuine Toner Cartridge 057 Black (3009C001), 1-Pack imageCLASS MF449dw, MF448dw, MF445dw, LBP228dw, LBP227dw, LBP226dw Laser Printers, Standard ASIN: B07WWK22KW Infringed Registrations: U.S. Reg. No. 1,315,232 U.S. Reg. No. 2,674,673 U.S. Reg. No. 975,904 U.S. Reg. No. 4,903,423	<ul style="list-style-type: none"> On or about November 15, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

<p>Canon Genuine Toner Cartridge 137 Black (9435B001), 1-Pack ImageCLASS MF212w, MF216n, MF217w, MF244dw, MF247dw, MF249dw, MF227dw, MF229dw, MF232w, MF236n, LBP151dw, D570 Laser Printers</p> <p>ASIN: B00N99DC8Q</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about November 15, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.
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DEFENDANT 5: Ferdi Celik

Selling Account Name: EFYC Shop LLC

Dates of Known Sales of Infringing Products: 11/14/2022 – 7/2/2022

Purported Product	Confirmation of Counterfeit
<p>Canon CRG-046 4-Color Complete Toner Cartridge Set</p> <p>ASIN: B07VGRJ3L8</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about August 29, 2023, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample products and confirmed that they are counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

Selling Account Name: Lake Falls

Dates of Known Sales of Infringing Products: 9/18/2023 – 3/2/2024

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner Cartridge 057 Black (3009C001), 1-Pack imageCLASS MF449dw, MF448dw, MF445dw, LBP228dw, LBP227dw, LBP226dw Laser Printers, Standard</p> <p>ASIN: B07WWK22KW</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about November 15, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.
<p>Canon Genuine Toner Cartridge 137 Black (9435B001), 1-Pack ImageCLASS MF212w, MF216n, MF217w, MF244dw, MF247dw, MF249dw, MF227dw, MF229dw, MF232w, MF236n, LBP151dw, D570 Laser Printers</p> <p>ASIN: B00N99DC8Q</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about November 15, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.

Selling Account Name: Whiteacikgoz

Dates of Known Sales of Infringing Products: 1/9/2023 – 2/14/2023

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner Cartridge 137 Black (9435B001), 1-Pack ImageCLASS MF212w, MF216n, MF217w, MF244dw, MF247dw, MF249dw, MF227dw, MF229dw, MF232w, MF236n, LBP151dw, D570 Laser Printers</p> <p>ASIN: B00N99DC8Q</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about September 1, 2023, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.

DEFENDANT 6: Ibrahim Celik

Selling Account Name: BlackWhiteShop1

Dates of Known Sales of Infringing Products: 5/6/2022 – 11/22/2022

Purported Product	Confirmation of Counterfeit
<p>Canon CRG-046 4-Color Complete Toner Cartridge Set</p> <p>ASIN: B07VGRJ3L8</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about October 4, 2023, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

DEFENDANT 7: Alona Hurniak

Selling Account Name: Zelssi

Dates of Known Sales of Infringing Products: 9/20/2023 – 3/19/2024

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner, Cartridge 104 Black (0263B001), 1 Pack, for Canon imageCLASS D420, D480, MF4150d, MF4270dn, MF4350d, MF4370dn, MF4690 Laser Printer and FAXPHONE L120, L90</p> <p>ASIN: B000B02BEM</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p>	<ul style="list-style-type: none"> On or about November 16, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.
<p>Canon CRG-046 4-Color Complete Toner Cartridge Set</p> <p>ASIN: B07VGRJ3L8</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about November 16, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.
<p>Canon Genuine Toner Cartridge 052 Black, High Capacity (2200C001), 1-Pack, for Canon imageCLASS MF429dw, MF426dw, MF424dw, LBP215dw, LBP214dw Laser Printers, Toner 052 High Capacity Black, 1 Size</p> <p>ASIN: B07BFF62Y5</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p>	<ul style="list-style-type: none"> On or about November 16, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.

U.S. Reg. No. 975,904 U.S. Reg. No. 4,903,423	
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DEFENDANT 8: Zekeriya Keskin

Selling Account Name: Mundsy

Dates of Known Sales of Infringing Products: 8/18/2022 – 12/13/2022

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner, Cartridge 045 Magenta (1240C001), 1 Pack, for Canon Color imageCLASS MF634Cdw, MF632Cdw Laser Printer</p> <p>ASIN: B06Y171NQT</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about March 13, 2024, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

Selling Account Name: Zelssi

Dates of Known Sales of Infringing Products: 9/20/2023 – 3/19/2024

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner, Cartridge 104 Black (0263B001), 1 Pack, for Canon imageCLASS D420, D480, MF4150d, MF4270dn, MF4350d, MF4370dn, MF4690 Laser Printer and FAXPHONE L120, L90</p> <p>ASIN: B000B02BEM</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p>	<ul style="list-style-type: none"> On or about November 16, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.

	<ul style="list-style-type: none"> Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.
<p>Canon CRG-046 4-Color Complete Toner Cartridge Set</p> <p>ASIN: B07VGRJ3L8</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about November 16, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.
<p>Canon Genuine Toner Cartridge 052 Black, High Capacity (2200C001), 1-Pack, for Canon imageCLASS MF429dw, MF426dw, MF424dw, LBP215dw, LBP214dw Laser Printers, Toner 052 High Capacity Black, 1 Size</p> <p>ASIN: B07BFF62Y5</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about November 16, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.

DEFENDANT 9: Pavlo Poperechniuk

Selling Account Name: Lake Falls

Dates of Known Sales of Infringing Products: 9/18/2023 – 3/2/2024

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner Cartridge 057 Black (3009C001), 1-Pack imageCLASS MF449dw, MF448dw, MF445dw, LBP228dw, LBP227dw, LBP226dw Laser Printers, Standard</p> <p>ASIN: B07WWK22KW</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about November 15, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed the invoice was fabricated based on deviations from an authentic invoice.
<p>Canon Genuine Toner Cartridge 137 Black (9435B001), 1-Pack ImageCLASS MF212w, MF216n, MF217w, MF244dw, MF247dw, MF249dw, MF227dw, MF229dw, MF232w, MF236n, LBP151dw, D570 Laser Printers</p> <p>ASIN: B00N99DC8Q</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about November 15, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.

DEFENDANT 10: Varvara SukachovaSelling Account Name: Alona Hurniak⁴

Dates of Known Sales of Infringing Products: 8/24/2023 – 10/18/2023

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner, Cartridge 047 Black (2164C001), 1 Pack, for Canon imageCLASS LBP113w, MF113w Laser Printer ASIN: B07H9VPC1V</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about January 16, 2024, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

Selling Account Name: BHT Products

Dates of Known Sales of Infringing Products: 11/29/2023 – 1/10/2024

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner Cartridge 052 Black (2199C001), 1-Pack, for Canon imageCLASS MF429dw, MF426dw, MF424dw, LBP215dw, LBP214dw Laser Printers, 1 Size (Toner 052)</p> <p>ASIN: B07BDKNZP6</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about January 25, 2024, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample products and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

⁴ The Alona Hurniak Selling Account previously operated under the name "In Store Terzi."

Selling Account Name: DA Company

Dates of Known Sales of Infringing Products: 2/1/2022 – 11/27/2022

Purported Product	Confirmation of Counterfeit
<p>Canon CRG-046 4-Color Complete Toner Cartridge Set</p> <p>ASIN: B07VGRJ3L8</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about August 16, 2023, Amazon sent to Canon samples of the product sold by the bad actor. Canon received and inspected the sample products and confirmed that they are counterfeit based on deviations from Canon's authentic product and packaging.

Selling Account Name: Mundsy

Dates of Known Sales of Infringing Products: 8/18/2022 – 12/13/2022

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner, Cartridge 045 Magenta (1240C001), 1 Pack, for Canon Color imageCLASS MF634Cdw, MF632Cdw Laser Printer</p> <p>ASIN: B06Y171NQT</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about March 13, 2024, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

DEFENDANT 11: Batuhan Terzi

Selling Account Name: Alona Hurniak

Dates of Known Sales of Infringing Products: 8/24/2023 – 10/18/2023

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner, Cartridge 047 Black (2164C001), 1 Pack, for Canon imageCLASS LBP113w, MF113w Laser Printer ASIN: B07H9VPC1V</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about January 16, 2024, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

DEFENDANT 12: Medeni Uludag

Selling Account Name: BlackWhiteShop1

Dates of Known Sales of Infringing Products: 5/6/2022 – 11/22/2022

Purported Product	Confirmation of Counterfeit
<p>Canon CRG-046 4-Color Complete Toner Cartridge Set</p> <p>ASIN: B07VGRJ3L8</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about October 4, 2023, Amazon sent to Canon a sample of the product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed that the invoice was fabricated based on deviations from an authentic invoice.

DEFENDANT 13: Yigit Can Celenogu

Selling Account Name: Lake Falls

Dates of Known Sales of Infringing Products: 9/18/2023 – 3/2/2024

Purported Product	Confirmation of Counterfeit
<p>Canon Genuine Toner Cartridge 057 Black (3009C001), 1-Pack imageCLASS MF449dw, MF448dw, MF445dw, LBP228dw, LBP227dw, LBP226dw Laser Printers, Standard</p> <p>ASIN: B07WWK22KW</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about November 15, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging. Amazon inspected an invoice provided in connection with this Selling Account. Amazon confirmed the invoice was fabricated based on deviations from an authentic invoice.
<p>Canon Genuine Toner Cartridge 137 Black (9435B001), 1-Pack ImageCLASS MF212w, MF216n, MF217w, MF244dw, MF247dw, MF249dw, MF227dw, MF229dw, MF232w, MF236n, LBP151dw, D570 Laser Printers</p> <p>ASIN: B00N99DC8Q</p> <p>Infringed Registrations:</p> <p>U.S. Reg. No. 1,315,232</p> <p>U.S. Reg. No. 2,674,673</p> <p>U.S. Reg. No. 975,904</p> <p>U.S. Reg. No. 4,903,423</p>	<ul style="list-style-type: none"> On or about November 15, 2023, Canon conducted a test purchase of the listed product sold by the bad actor. Canon received and inspected the sample product and confirmed that it is counterfeit based on deviations from Canon's authentic product and packaging.